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March 13, 2000

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Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Washington Utilities and Transportation Commission's Reply Comments in
Support of Its Petition for Additional Delegated Authority to Implement Number
Conservation Measures, CC Docket No. 96-98/ File No. NSD-L-99-102

Dear Ms. Salas:

Enclosed please find an original and five copies of the Washington Utilities and Transportation Commission's Reply Comments In Support of Its Petition for Additional Delegated Authority to implement number conservation measures. Please file-stamp one copy of the comments and return it to me in the enclosed envelope for our file. These comments also were filed electronically. Thank you for your courtesies.

Very truly yours,

Shannon E. Smith
Assistant Attorney General
(360) 664-1192

Enc.

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445 12th Street, S.W., Suite CY-A257, Washington, D.C. 20554, (202) 418-0270.

Interested parties may file comments concerning this matter on or before **February 28, 2000**, and reply comments on or before **March 13, 2000**. All filings must reference **File No. NSD-L-99-102 and CC Docket 96-98**. Send original and four copies to the Commission Secretary, Magalie Roman Salas, Portals II, 445 12th Street, SW, Suite TW-A325, Washington, D.C. 20554 and two copies to Al McCloud, Network Services Division, Portals II, 445 12th Street, S.W., Room 6A-320, Washington, D.C. 20554.

Comments may be filed using the Commission's Electronic Comment Filing System (ECFS) or by filing paper copies. Comments filed through the ECFS can be sent as an electronic file via the Internet to <http://www.fcc.gov/e-file/ecfs.html>. If using this method, please reference **CC Docket No. 96-98** in the Proceeding Block. Generally, only one copy of an electronic submission must be filed. In completing the transmittal screen, commenters should include their full name, Postal Service mailing address, and the applicable docket or rulemaking number. Parties may also submit an electronic comment by Internet e-mail. To get filing instructions for e-mail comments, commenters should send an e-mail to ecfs@fcc.gov, including "get form <your e-mail address>" in the body of the message. A sample form and directions will be sent in reply. After filing your comments electronically, please send an e-mail to Al McCloud, amccloud@fcc.gov, indicating that comments have been filed.

This is a "permit but disclose" proceeding for purposes of the Commission's *ex parte* rules. See generally 47 C.F.R. §§ 1.1200-1.1216. As a "permit but disclose" proceeding, *ex parte* presentations will be governed by the procedures set forth in Section 1.1206 of the Commission's rules applicable to non-restricted proceedings. 47 C.F.R. § 1.1206.

Parties making oral *ex parte* presentations are reminded that memoranda summarizing the presentation must contain a summary of the substance of the presentation and not merely a listing of the subjects discussed. More than a one or two sentence description of the views and arguments presented is generally required. See 47 C.F.R. § 1.1206(b)(2). Other rules pertaining to oral and written presentations are set forth in Section 1.1206(b) as well.

For further information contact Aaron Goldberger of the Common Carrier Bureau, Network Services Division, at (202) 418-1591 or agoldber@fcc.gov. The TTY number is (202) 418-0484.

-FEDERAL COMMUNICATIONS COMMISSION-

Before the
Federal Communications Commission
Washington, D.C. 20554

MAR 14 2000

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In the Matter of)	CC Docket 96-98
)	
Washington Utilities and Transportation)	
Commission's Petition for Additional)	
Delegated Authority to Implement)	File No. NSD-L-99-102
Number Conservation Measures)	
)	
)	

**WASHINGTON UTILITY AND TRANSPORTATION COMMISSION'S
REPLY COMMENTS IN SUPPORT OF
PETITION FOR ADDITIONAL DELEGATED AUTHORITY
TO IMPLEMENT NUMBER CONSERVATION MEASURES**

The Washington Utilities and Transportation Commission (WUTC) submits these Reply Comments in support of its Petition for Delegation of Authority to Implement Number Conservation Measures filed December 10, 1999.

The industry commenters to this petition have essentially stated that the Commission should reject the Washington Utilities and Transportation Commission's request and allow the current wasteful practice of assigning numbers to continue.¹ They make the arguments that the new area codes are "needed" by carriers, regardless of the impact on the public, until a viable solution is reached at a national level. Although the WUTC agrees that national solutions are needed, agreement on a national level is not proceeding fast enough to provide critically needed solutions on a local level. The parties to this practice are perpetuating a system in which valuable numbering resources are not efficiently used by the industry, which has contributed to

¹The Maine Public Utilities Commission and the Massachusetts Department of Telecommunications and Energy filed comments in support of the WUTC's petition.

accelerated exhaust of numbers.

I. Industry Needs to Be Encouraged to Conserve Prefixes

In its Comments, AT&T² reiterates comments made in other states in the U S WEST region that U S WEST's policy of requiring each CLEC to use a different local routing number (LRN) in each rate center is an inefficient and misguided use of prefixes. This practice is especially burdensome in Washington State's 360 Area Code where there are more than 130 rate centers. The WUTC supports AT&T in its efforts to require U S WEST to abandon its policy of requiring carriers to have a separate LRN for each rate center. It is the WUTC's understanding that U S WEST is no longer following this practice. Therefore, it is the WUTC's position that industry, including AT&T, should be encouraged to return LRN prefixes that are no longer required to the code administrator.

II. FCC Should Revisit the Use of Unassigned Number Porting

The FCC recognized the importance of Local Number Portability (LNP) in assuring the nondiscriminatory provision of competitive services by issuing several orders to guarantee the timely introduction of this technology. The WUTC recognizes that LNP not only preserves fair competition, it also provides an opportunity to foster number conservation. The use of interim unassigned number porting (IUNP) will allow CLECs and other carriers with LNP technology to port unassigned numbers between themselves in congested area codes. The WUTC is interested in achieving significant rate center consolidation in Washington. However, the time frames needed to bring about consolidation may require the use of some interim measures, such as

²*In the Matter of Washington Utilities and Transportation Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures*, Comments of AT&T Corp., February 28, 2000.

IUNP, in order to guarantee that all carriers are able to provide service and have access to numbers within existing area codes.

Similarly, the WUTC foresees a potential need for the use of the existing thousand number block pooling (TNP) software. There is no guarantee that the next version of the TNP software will be available in a timely manner for use in relieving Washington's area codes. Although, industry is asking everyone to wait for the version 3.0 of TNP software, prefixes continue to be ordered at an alarming rate. Therefore, the WUTC requests that the FCC grant it authority to implement the existing version of the TNP software, if needed, as has been delegated to other states, such as Maine.

III. The WUTC Agrees That National Standards Are Needed

In its Comments, GTE³ opposed the WUTC Petition. However in each of its comments GTE reiterated the need for "national number assignment standards." The WUTC agrees with GTE that there should be national standards, provided those standards are strong enough to protect customers from the adverse impacts of current industry practices. Unfortunately, customers in the state of Washington are suffering from the lack of national standards and the lack of uniform cooperation between the industry and standards implementation groups. The WUTC believes that states need to be granted statutory approval to move ahead on number conservation measures until satisfactory and sufficient national standards are in place and working properly.

³*In the Matter of Washington Utilities and Transportation Commission's Petition for Delegation of Additional Authority to Implement Number Conservation Measures*, Comments of GTE, February 28, 2000.

IV. The WUTC Should Be Granted the Authority it Seeks

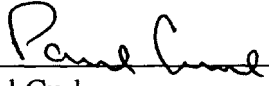
Illinois and other states that have been granted authority to use code conservation and number pooling have been successful in extending the lives of their area codes. The WUTC believes that the current area code situation in Washington has reached crisis proportions with the numbering plan administrator now showing all five existing area codes (206, 425, 253, 360, and 509) exhausting within the next three years. While it is desirable to have national guidelines and standards in place to help alleviate situations similar to the exhaust situation now occurring, the WUTC feels that it needs statutory authority to implement extraordinary measures on an interim basis. Therefore the WUTC continues to request that the FCC grant the WUTC authority to implement the following five measures.

- (1) enforce number assignment standards, including auditing the use of numbering resources, and reclaiming unused and reserved area codes;
- (2) implement mandatory thousand number block pooling (TNP) trials using existing TNP software until the later editions are available;
- (3) adopt interim number assignment standards;
- (4) implement interim unassigned number porting (INUP); and
- (5) revise rationing procedures if necessary.

The WUTC will use this additional authority to delay new area codes in the 206, 425, 253, 360 and 509 area codes and prolong the lives of new NPAs, such the 564 area code.

Respectfully submitted,

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION



Paul Curl
Deputy Director, Regulatory Affairs

March 13, 2000